

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

FLEUR BRESLER, *et al.*,  
Plaintiffs,

v.

WILMINGTON TRUST COMPANY, *et al.*,  
Defendants.

Civil Action No.: 09-cv-02957-PJM  
(lead case)  
Consolidated with  
Civil Action No.: 12-cv-03295-PJM

**DAUBERT MOTION OF DEFENDANTS WILMINGTON TRUST COMPANY AND  
WILMINGTON BROKERAGE SERVICES COMPANY TO EXCLUDE THE EXPERT  
OPINIONS OF ALL PLAINTIFFS' PROFFERED EXPERTS**

Pursuant to the Court's October 2, 2013 Order Granting Joint Motion for Entry of Order Setting Pre-Trial Briefing Schedule [ECF No. 485], Defendants Wilmington Trust Company and Wilmington Brokerage Services Company (collectively, "Wilmington") hereby respectfully move this Court to exclude the expert opinions of all Plaintiffs' expert witnesses for all purposes at trial. These proffered expert witnesses include Robert Pugh, Jeremy Green, Steve Masterson, and Randolph Whitelaw. Wilmington requests that the Court exclude these opinions on grounds that they fail to meet the threshold requirements of reliability and relevancy under Rule 702 of the Federal Rules of Evidence ("Rules") and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993). In support thereof, Wilmington attaches the accompanying memorandum of points and law.

Respectfully submitted,

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